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April 2, 2025

BY ECF

Honorable Judge Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Burns, Janet, et al. vs City Of New York, et al.
25-CV-1999 (GHW) (RFT)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing defendants City of New York (“the City”), former Mayor Bill De Blasio, former New York City Police Department Commissioner Dermot Shea, and former New York City Police Department Chief of Department Terence Monahan (hereinafter “defendants”) in the above referenced matter. In that capacity, I write to respectfully request a fifty-six to sixty day enlargement of time from April 4, 2025 and April 8, 2025 to and including June 3, 2025, within which defendants may answer or otherwise respond to the First Amended Complaint.¹ Plaintiffs’ counsel, Ms. Elena Cohen, Esq., consents to the enlargement of time. This is the first request for an enlargement of time.

By way of relevant background, on March 10, 2025, plaintiffs filed the Complaint. See ECF No. 1. On March 13, 2025, plaintiffs filed the First Amended Complaint and claim, *inter alia*, that they were falsely arrested between May 28, 2020 and November 5, 2020 in various locations in New York City. See ECF No. 11. Before we can adequately respond to the First Amended Complaint, we will need to conduct an investigation into the facts of the case. We requested executed authorizations from plaintiffs for the release of the underlying criminal records sealed pursuant to NYCPL § 160.50 (1)(d) for plaintiffs’ arrests today. An enlargement of time will allow this Office time to obtain the plaintiffs’ executed authorizations for the release of the underlying arrests and medical records with requests for records to the appropriate agencies and medical facilities. In order to respond to the allegations contained in the First Amended Complaint, defendants must obtain records of the underlying criminal cases including Police, Criminal Court

¹ Upon information and belief, the City was served on March 14, 2025, and defendants de Blasio, Shea, and Monahan were served on March 18, 2025.

and District Attorney's records. It is our understanding that these records may be sealed pursuant New York Criminal Procedure Law § 160.50. Defendants cannot obtain these records without these authorizations, and without the records, defendants cannot properly assess this case or respond to the First Amended Complaint. Accordingly, defendants require this enlargement so that this Office may obtain the underlying documentation, properly investigate the allegations of the First Amended Complaint and fulfill our obligations under Rule 11 of the Federal Rules of Civil Procedure.

In view of the foregoing, defendants respectfully request an enlargement of time from April 4, 2025 and April 8, 2025 to and including June 3, 2025 within which defendants may answer or otherwise respond to the First Amended Complaint. Thank you for your consideration herein.

Respectfully submitted,

/s/ *Yini Zhang*

Yini Zhang

Senior Counsel

Special Federal Litigation Division

cc: Counsels of Record (By ECF)